



November 30, 2011

Via E-mail

Dr. Ruth Lunn
Director, Office of the Report on Carcinogens
DNTP, NIEHS
P.O. Box 12233, MD K2-14
Research Triangle Park, NC 27709

Re: Proposed National Toxicology Program (NTP) Review Process for
the Report on Carcinogens: Request for Public Comment and
Listening Session, 76 Fed. Reg. 67200 (Oct. 31, 2011)

Dear Dr. Lunn:

The North American Metals Council (NAMC)¹ is pleased to submit these comments in response to the National Toxicology Program's (NTP) request for public input on the proposed review process for the Report on Carcinogens (RoC) (76 Fed. Reg. 67200 (Oct. 31, 2011)). NAMC is highly concerned with any changes in the RoC process that will decrease scientific robustness and public engagement.

Given the significant impact of listings in the RoC on businesses, it is absolutely critical that NTP's procedures provide a sufficiently transparent process that allows for scientific input through peer review and for public feedback. Specifically, NAMC strongly opposes the proposed removal of public comment opportunities and peer review in the RoC review process.

In addition to the issues already noted, we support and endorse the November 21, 2011, letter from the Nickel Institute and the November 22, 2011, letter from the U.S. Small Business Administration Office of Advocacy.

¹ NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American "metals industry") on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.



North American Metals Council

Dr. Ruth Lunn
November 30, 2011
Page 2

Thank you for this opportunity.

Regards,

[Redacted]

Kathleen M. Roberts
NAMC Executive Director